

1 MARY KATE SULLIVAN (State Bar No. 180203)
mks@severson.com
2 ALISA A. GIVENTAL (State Bar No. 273551)
aag@severson.com
3 SEVERSON & WERSON
A Professional Corporation
4 One Embarcadero Center, Suite 2600
San Francisco, California 94111
5 Telephone: (415) 398-3344
Facsimile: (415) 956-0439
6
7 Attorneys for Defendants
WELLS FARGO BANK, N.A.

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION

10 DAVID STRONG,

Case No. 3:17-CV-00503-RS

11 Plaintiff,

12 vs.

13 EXPERIAN INFORMATION SOLUTIONS,
INC.; WELLS FARGO BANK, NATIONAL
14 ASSOCIATION; TD BANK USA,
NATIONAL ASSOCIATION AND DOES 1
15 THROUGH 100 INCLUSIVE,

**STIPULATION TO EXTEND TIME FOR
DEFENDANT WELLS FARGO BANK,
N.A. TO RESPOND TO FIRST AMENDED
COMPLAINT AND [PROPOSED] ORDER**

16 Defendants.

17
18 Plaintiff DAVID STRONG (“Plaintiff”) and defendant WELLS FARGO BANK, N.A.,
19 (“Defendant”), hereby stipulate as follows:

20 **RECITALS**

21 1. Plaintiff filed this action against Defendant on January 31, 2017 and served
22 Defendant on February 2, 2017.

23 2. Defendant’s initial deadline to respond to the Complaint was February 23, 2017

24 3. Plaintiff and Defendant agreed to extend the time for Defendant to respond to the
25 Complaint up to and including March 27, 2017, so that Defendant could have additional time to
26 investigate this matter and the parties may explore the possibility of settlement.

27 4. On or about March 15, 2017, Plaintiff informed Defendant that he intended to file a

1 First Amended Complaint in the Action no later than April 7, 2017. Accordingly, Plaintiff and
2 Defendant agreed that Defendant's deadline to respond to the complaint should be further
3 extended to, April 28, 2017, which was 21 days from the anticipated date of Plaintiff filing an
4 amended complaint.

5 5. Plaintiff did not file an amended Complaint by April 7, 2017, but indicated his
6 intention to do so in the near future. Accordingly, the parties agreed to extend Defendant's
7 response deadline to May 26, 2017.

8 6. Plaintiff filed the First Amended Complaint on April 28, 2017. Plaintiff and
9 Defendant stipulated to extend the response deadline to June 26, 2017.

10 7. Based on the allegations in the First Amended Complaint and informal discovery,
11 Plaintiff and Defendant are exploring settlement and stipulate that Defendant's deadline to respond
12 to the First Amended Complaint shall be extended by another 30 days, up to and including July
13 26, 2017.

14 8. This change in deadline will not alter the date of any event or any deadline already
15 fixed by Court order, local rules, or the Federal Rules of Civil Procedure.

16 THEREFORE, the parties stipulate as follows:

STIPULATION

18 1. The deadline for Defendant to respond to the anticipated First Amended Complaint
19 or, in the event no amended complaint is filed, the initial complaint, shall be up to and including
20 July 26, 2017.

21 2. This change in deadline will not alter the date of any event or any deadline already
22 fixed by Court order, local rules, or the Federal Rules of Civil Procedure.

IT IS SO STIPULATED.

24 || DATED: June 23, 2017

SAGARIA LAW, P.C.

By: /s/ Elliot W. Gale
Elliot W. Gale

Attorneys for Plaintiff DAVID STRONG

1
2 DATED: June 23, 2017

SEVERSON & WERSON
A Professional Corporation

5 By: /s/ Alisa A. Givental
6 Alisa A. Givental

7 Attorneys for Defendants WELLS FARGO BANK,
8 N.A.

9 Pursuant to Local Rule 5-1(i)(3), I -- Alisa A. Givental – attest that concurrence in the filing of
10 this document has been obtained from Elliot W. Gale, /s/ Alisa A. Givental

11 **[PROPOSED] ORDER**

12 Pursuant to the stipulation of the parties and good cause appearing, Wells Fargo Bank,
13 N.A.'s deadline to respond to the anticipated First Amended Complaint or, in the event no
14 amended complaint is filed, the initial complaint, shall be up to and including July 26, 2017. No
15 other deadlines shall be affected by this Order.

16 IT IS SO ORDERED.

17
18 DATED: 6/26/17


19 HONORABLE RICHARD SEEBORG
20 UNITED STATES JUDGE